



State Significant Development Application

General Operations Plan
of Management

CONTENTS

1. INTRODUCTION	2
2. OVERVIEW.....	2
3. OBJECTIVES	2
4. STATUTORY FRAMEWORK	3
5. TRADING HOURS	3
6. GAMING OPERATIONS	4
7. LIQUOR OPERATIONS.....	5
8. FOOD SERVICE OPERATIONS	6
9. ENVIRONMENTAL MANAGEMENT	7
10. RISK MANAGEMENT	8
11. VENUE SECURITY & PATRON MANAGEMENT	9
12. WORK HEALTH AND SAFETY	10
13. COMMUNITY LIAISON	11
14. EMPLOYEE TRAINING	12
15. COMPLAINTS HANDLING	13
16. CAR PARK MANAGEMENT	14

1. INTRODUCTION

This plan of management has been prepared in accordance with the requirements of the State Significant Development Application process, and shows the framework for the management of DOOLEYS' ("the Club") general operational risks, processes, procedures during the proposed construction period, and beyond.

This plan of management establishes objectives, strategies and actions that identify the means DOOLEYS employs in the operational management of the Licensed Registered Club and associated business entities.

2. OVERVIEW

DOOLEYS Lidcombe Catholic Club Pty Ltd is an industry-leading destination for leisure, dining, entertainment and function facilities. We employ more than 350 employees in full-time and part-time roles over three exceptional venues across central western Sydney and a health and fitness centre:

- DOOLEYS Lidcombe Catholic Club,
- DOOLEYS Waterview Club,
- DOOLEYS Regents Park Sports Club, and
- DOOLEYS Health + Fitness.

Our mission is simple – to provide premium leisure and entertainment destinations for our Members and local communities.

DOOLEYS is also committed to our local community and actively participates in community life through a variety of key partnerships, sponsored events and employee volunteer opportunities. Each year, we proudly support over 140 local community organisations, charity groups and sporting associations through funding programs such as ClubGRANTS, sponsorships, donations and in-kind support.

3. OBJECTIVES

This plan of management details the operational business processes by:

- Identifying the third party and internal resources available to DOOLEYS general operations,

- Recognising the various legislations and regulatory bodies that overarch the operation, and
- Identify policies and procedures that drive department managers to meet the obligations.

4. STATUTORY FRAMEWORK

DOOLEYS is regulated by Liquor & Gaming NSW (LGNSW) which provides administrative, review and secretariat support to the Independent Liquor & Gaming Authority (ILGA). Liquor & Gaming NSW also determines routine licensing applications under delegation from ILGA, such as an application for a liquor license for a restaurant or sporting club.

The Independent Liquor & Gaming Authority is an independent statutory decision-maker responsible for a range of casino, liquor, registered club and gaming machine regulatory functions including determining licensing and disciplinary matters under the gaming and liquor legislation.

DOOLEYS operate primarily under the:

- Gaming Machines Act 2001,
- Gaming Machines Regulations 2010,
- Liquor Act 2007,
- Liquor Regulations 2008,
- Registered Clubs Act 1976, and
- Registered Clubs Regulations 2015.

5. TRADING HOURS

DOOLEYS has unrestricted on premises trading hours as a business with a liquor licence acquired prior 1/7/2008, DOOLEYS complies with the new take-away alcohol laws which changed in NSW with all take-away trading ceasing at 10.00pm.

DOOLEYS is closed for trading on Good Friday and Christmas Day. Gaming machine shutdown hours apply Monday to Friday 4:00am to 10.00am with Friday, Saturday, Sunday and public holidays trading being 6:00am to 9.00am. These trading hours reflect the approved times on the liquor license and the Local Council DA-162/2005.

6. GAMING OPERATIONS

Objectives:

- Provide a responsible service of gaming to our customers,
- To comply with the Gaming Machines Act 2001 and Gaming Machines Regulations 2010,
- To comply with the Anti-Money Laundering and Counter Terrorism Act,
- Provide the Board with the relevant financial compliance information on gaming, and
- Ensure gaming harm minimisation controls are in place and accessible to customers.

Controls:

- Front line employees trained in Responsible Conduct of Gaming (RCG),
- Front-of-house managers and supervisors receive additional counselling training with partner organisations GAINS and MPGS,
- Bet-Safe and Club-Safe quarterly gaming compliance inspections,
- Internal compliance inspection on gaming machines,
- AML/CTF manual and review process with an independent assessor,
- AML/CTF internal compliance process in place,
- Group Gaming Manager submits a monthly Directors Report highlighting any compliance issues as per Clause 18 – Additional Reports of the Gaming Machines Regulation Act 2010,
- Employees trained in managing gaming self-exclusions,
- Compliance with the Registered Clubs Act requirements for entry into the Club,
- Appropriate gaming awareness signage throughout the premises, and
- Provide a customer-friendly and easily assessable gaming self-exclusion program for customers.

7. LIQUOR OPERATIONS

Objectives:

- To comply with the Liquor Act 2007 and Liquor Regulations 2008,
- Provide a responsible service of alcohol management plan and policy,
- Provide a customer friendly and easily assessable liquor self-exclusion program for customers, and
- To contribute to liquor awareness campaigns for the community.

Controls:

- Front line employees trained in the Responsible Service of Alcohol (RSA),
- DOOLEYS in-house service of alcohol policy monitored by Duty Managers and frontline employees,
- Liquor & Gaming NSW incident register kept electronically with notifications being actioned by the Duty Manager and the Group Security Manager,
- Third-party compliance inspections carried out quarterly,
- Compliance with the Registered Clubs Act requirements for entry into the Club,
- Trained security personnel assist with monitoring responsible service of alcohol and report to the Duty Manager, and
- Active participation on the committee of the Flemington Liquor Accord.

8. FOOD SERVICE OPERATIONS

Objectives:

- To assure that all foods prepared by DOOLEYS are stored, prepared and served safely to our customers, and
- To ensure compliance with Food Standard Australia New Zealand (FSANZ) Australian Food Standards Code, in particular:
 - Standard 3.2.1 of the Australian Food Standards Code – Food Safety Practices & General Requirements,
 - Standard 3.2.2 of the Australian Food Standards Code – Food Safety Practices & General Requirements, and
 - Standard 3.2.3 of the Australian Food Standards Code – Food Premises and Equipment, and Food Industry Recall Protocol.

Controls:

- DOOLEYS employs trained and qualified Chefs,
- Compliance with the requirement to have qualified food safety supervisors on site,
- Independent food safety inspections carried out on a scheduled basis throughout the business to complement the unscheduled local council environmental inspections, and
- DOOLEYS specific food safety plan in place and reviewed annually.

9. ENVIRONMENTAL MANAGEMENT

Objectives:

- Establish DOOLEYS Group as a leader in the field of sustainability,
- Develop appropriate policy, systems, processes and targets to support DOOLEYS' environmental performance,
- Ensure all DOOLEYS facilities are energy, water and waste efficient,
- Identify, rectify and report on governance and compliance issues that relate to utilities, and
- Ensure that Club operations do not pose an adverse impact to the environment and the long term commitment of the business towards sustainability.

Controls:

- DOOLEYS Smart Club Green Community sustainability strategy, which commits the Club to:
 - Consider ESD principles into all refurbishments and building work,
 - Any refurbishment or new building work with a contract value of \$5 million and above will be certified with a Green Star Design & As Built (or equivalent) rating,
 - Increasing energy, water and waste productivity,
 - Assisting and educating community organisations and members with their sustainability performance, and
 - Transparent measurement and verification.
- Monthly sustainability report to the Board on the energy, water and waste performance, plus governance and compliance issues as they arise.

10. RISK MANAGEMENT

Objectives:

- To manage risks at all levels within the organisation, and
- To operate effectively and efficiently while meeting the required standards of accountability, compliance and transparency.

Controls:

- DOOLEYS classifies its risks within three categories:
 - Strategic,
 - Financial, and
 - Operational Compliance.
- The risk management process is aligned to the Australian/New Zealand Risk Management standard AS/NZS ISO 31000:2009, and
- Key components are:
 - Establishing the context,
 - Risk assessment,
 - Risk treatment, and
 - Risk recording and monitoring.

11. VENUE SECURITY & PATRON MANAGEMENT

Objectives:

- Committed to protecting the company's employees, properties, assets, reputation and customers from potential risks by implementing appropriate management strategies to deal with threats and risks, both immediately and in the long term.

Controls:

- CCTV cameras coverage throughout internal and external areas of the Club,
- Access control to restricted areas,
- Security Officers on site 24 hours a day both internally and externally,
- Armed Cash-in-Transit company deliver and collect cash,
- Membership entering must show a valid membership card whilst all visitors over 18 years must sign in using a Circlescan terminal, and
- All patrons are subject to all laws, rules and regulations of the Liquor Act and Registered Clubs Act as well as the DOOLEYS Constitution.

12. WORK HEALTH AND SAFETY

Objectives:

- To provide a safe workplace and meeting all our legislative obligations,
- To use a planned systematic approach to the management of Workplace Health and Safety,
- To provide the resources for the successful implementation of the organisations Work Health and Safety (WHS) Management System, and
- To provide for consultation and cooperation between the Persons Conducting a Business or Undertaking (PCBU) and the workers in achieving these objectives.

Controls:

- Officers of the PCBU have a primary duty of care to ensure so far as is reasonably practicable the health and safety of workers while they are at work,
- Offices of the PCBU are required to take reasonable steps to ensure due diligence and have relevant knowledge of WHS matters and understanding of the workplace to ensure the PCBU meets their duties,
- Monthly venue inspections in conjunction with monthly WHS meetings are undertaken on a rotational basis by members of the WHS committee,
- Hazard and accident notification system and procedures in place to report known or observed hazards to management, and
- Induction process in place.

13. COMMUNITY LIAISON

Objectives:

- To actively participate in the community through a variety of key partnerships,
- To actively participate through sponsorship and employee volunteer opportunities, and
- To support local community organisations, charity groups and sporting associations.

Controls:

- ClubGRANTS guidelines,
- DOOLEYS internal funding application process,
- DOOLEYS community engagement plan, and
- DOOLEYS Board approval process.

14. EMPLOYEE TRAINING

Objectives:

- To develop a work culture that encourages and recognises a highly skilled and flexible workforce.

Controls:

- All new employees complete a thorough three day induction program, incorporating; DOOLEYS history, policies/procedures, customer service, food safety, emergency procedures, Workplace Health & Safety,
- Employees provided with an opportunity to achieve Certificate III & Certificate IV in Hospitality,
- Employees provided with supervised on-the-job training and demonstrations, prior to undertaking duties on a first time basis,
- Compliance training courses, which include:
 - Armed Robbery,
 - Bullying & Harassment,
 - Procedure Manuals (SOPs), and
 - Fire Evacuation is undertaken by all employees.
- Monthly soft skill training programs delivered delivered in-house to enhance individual skills and abilities include:
 - Service Difference,
 - Cultural Awareness,
 - Dealing with Change,
 - Complaint Handling, amongst others.
- Annual discussions held with all employees to determine Professional Development needs, and
- Additional training opportunities notified to employees by way of internal messaging systems.

15. COMPLAINTS HANDLING

Objectives:

- To provide our customers with a variety of mechanisms that enable them to give feedback on the business, with that feedback being addressed in a timely manner by the appropriate person.

Controls:

- Complaint forms collected electronically and monitored for repeated issues,
- Additional training provided in areas of customers service as result of complaint,
- Front line staff are aware of complaint handling processes,
- Complaints and all supporting documentation provided during the investigation are accepted in a number of formats, including written letters, emails, phonecalls and in some cases front line staff are available and able to translate should there be complaints from members and guests whose first language is not English, and
- Staff who are handling complaints are empowered to either resolve the complaint or be aware of and have access to the person who can resolve the issue.

16. CAR PARK MANAGEMENT

Objectives:

- To manage the Club's car parks in a service oriented, secure and professional manner.

Controls:

- There are three designated parking areas within the bounds of the Club.
 - The members-only car park is located off Board Street and consists of 59 parking spaces. This area is secured by a roller shutter and can only be accessed during Club opening hours by members via their membership card. The car park is covered by 16 CCTV cameras which is monitored by the Security Control Room,
 - The multi-level car park is located on the grounds of the Club and is accessed via Church Street. This is accessible by any patrons 24 hours a day and consists of eight levels with 205 parking spaces. There is adequate external lighting throughout the levels, lift and stairwells. There are 32 CCTV cameras located throughout this car park which is monitored by the Security Control Room, and
 - The western on-grade car park is also accessible via Church Street 24 hours a day and has two separate entry points (upper and lower). This is an outdoor car park which is used by all patrons, consists of 256 parking spaces and is covered by 36 CCTV cameras which is monitored by the Security Control Room. The area is adequately lit throughout with no black or blind spots.
- The western car park is the access point for all deliveries to the club and is often utilised by heavy vehicles,
- The car parks are actively patrolled 24 hours each day by Security Officers and Courtesy Buggies are used to transport patrons to and from their vehicles safely,
- At times the lower entry gates to the western car park are locked during trading times to prevent people from parking their vehicle and leaving the Club without using any of the facilities, and
- Patrons using any of the Club's car park do so under the terms and conditions of the car park.